

From: [Chen, Isaac](#)
To: [Leslie Savage](#)
Subject: CZMP Consistency for OCS GP (GMG290000)
Date: Thursday, August 31, 2017 9:35:00 AM

Hi, Leslie,

I know it is not a good time to talk because of Harvey hurricane. At this moment, EPA does need your CZMP consistency determination letters for the Texas Stripper Well GP and the OCS GP, particularly the OCS GP (GMG290000), because without a new permit, no new activities are authorized after Sep. 30, 2017.

I knew you usually evaluated many permit conditions prior to making the decision. In your 2012 consistency letter for the GMG290000 GP, you evaluated EPA's proposed changes from the 2007 permit. So, I summarize changes from the 2012 permit:

- 1) One Notice of Intent (NOI) for each facility, instead one NOI for all facilities in a lease block (Industry already filed NOI for each facility)
- 2) Allow drilling vessels to be covered by the permit between jobs
- 3) Operators report all produced water sheen observed during the quarterly reporting period instead of the number of days during the worst month
- 4) Characterization Study: (a) removed study requirements for produced water and drilling fluids because operators completed studies and submitted results to EPA; (b) added study for well treatment, completion and workover fluids (a similar industry-wide study as required in Territorial Seas GP)
- 5) Add toxicity testing requirement for pipeline brine discharges
- 6) Allow operators to submit SEAMAP data instead of entrainment monitoring if the facility has done monitoring for two years
- 7) EPA decided to drop some proposed changes discussed in the fact sheet after considerations of Industry provided new information.

We believe those changes will enhance protections of water quality and aquatic life and fish habitat.

Please let me know if you need additional information. Thanks.

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